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April 11, 2022

VIA ECF

Hon. Barbara Moses, U.S.M.J. United States District Court Southern District of New York 500 Pearl St., Room 740 New York, NY 10007

MEMO ENDORSED

Re: <u>Seaman et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., 18-CV-1781</u> Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692

Dear Judge Moses:

We represent Plaintiffs in the above-referenced cases and write in response to the Trust Defendants' letter of April 8, 2022.¹

The Trust Defendants request permission to file a five-page brief responding to Plaintiffs' pending sanctions motion against the TSI Defendants for discovery violations about its Employee A. The request is inappropriate and should be denied, as the motion is against TSI only and TSI alone must answer for its discovery violations. The Trust Defendants have no reason to interject in the dispute.

However, if the Court grants the Trust Defendants' request, Plaintiffs ask the Court to allow Plaintiffs additional pages to respond to the Trust Defendants' additional arguments.

Respectfully submitted,

/s/ Gregory A. Frank

cc: all counsel (via ECF)

Application GRANTED. Plaintiffs' reply brief may be up to **15 pages** in length. SO ORDERED.

Barbara Moses

United States Magistrate Judge

April 11, 2022

¹ Dkt. No. 275 in Case No. 18-cv-1781; Dkt. No. 304 in Case No. 18-cv-7692.